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*Attorney for Richard and Deborah Felder,
The Richard and Deborah Felder
Foundation, Jonathan E. Felder, and
Jeffrey D. Felder*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR
PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF
INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**MOTION OF JEFFREY D. FELDER, ESQ. TO WITHDRAW AS ATTORNEY OF
RECORD FOR RICHARD AND DEBORAH FELDER, THE RICHARD AND DEBORAH
FELDER FOUNDATION, AND JONATHAN FELDER**

Undersigned counsel, Jeffrey D. Felder, hereby moves to withdraw as attorney of record for Richard and Deborah Felder, The Richard and Deborah Felder Foundation, and Jonathan Felder (the “Felder Claimants”), and in support states as follows:

1. On December 22, 2010, the Court granted undersigned counsel’s Motion for Admission *Pro Hac Vice* to represent himself and the Felder Claimants.
2. On February 19, 2011, undersigned counsel filed a consolidated objection to the Trustee’s determination of certain customer claims (the “Objection”). Undersigned counsel filed the Objection on behalf of himself and the Felder Claimants.
3. Since filing the Objection, undersigned counsel has not made any other filings in this matter.
4. On January 13, 2017, the Trustee filed the Trustee’s Motion and Memorandum of Law to Affirm His Determinations Denying Claims of Claimants Holding Interests in Judy L. Kaufman *et al.* Tenancy In Common, Richard B. Felder and Deborah Felder Tenancy In Common, and Keith Schaffer, Jeffrey Schaffer, Carla R. Hirschhorn Tenancy In Common (the “Motion”) (ECF No. 14844).
5. The Motion asks the Court to reject the Objection and to affirm the Trustee’s determination of claims.
6. Undersigned counsel has an irreconcilable conflict of interest that prevents him from continuing to represent the Felder Claimants.
7. Pursuant to Local Bankruptcy Rule 2090-1(e), counsel may only withdraw for cause shown. Undersigned counsel’s irreconcilable conflict of interest constitutes cause shown.
8. Undersigned counsel has conferred with the Felder Claimants and they do not object

to the relief requested in this motion.

9. The Felder Claimants will proceed *pro se* in this matter after undersigned counsel's withdrawal.

10. Undersigned counsel will continue to represent himself in this matter.

11. A proposed order is submitted with this motion.

WHEREFORE undersigned counsel respectfully requests that he be permitted to withdraw as counsel for the Felder Claimants.

Dated: February 27, 2017
Denver, Colorado

Respectfully submitted,

/s/Jeffrey D. Felder
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*Attorney for Richard and Deborah Felder,
The Richard and Deborah Felder
Foundation, Jonathan E. Felder, and
Jeffrey D. Felder*

Certificate of Service

I certify that I filed this **Motion of Jeffrey D. felder, Esq. to Withdraw as Attorney of Record for Richard and Deborah Felder, the Richard and Deborah Felder Foundation, and Jonathan Felder on February 27, 2017** using the CM/ECF system which caused it to be served on all parties to this matter who receive CM/ECF notifications.

/s/ Jeffrey D. Felder

Jeffrey D. Felder